

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

FEDERAL INSURANCE COMPANY,

Plaintiff / Counterclaim Defendant,

and

**PACIFIC EMPLOYERS INSURANCE
COMPANY, ACE AMERICAN
INSURANCE COMPANY, ACE
PROPERTY & CASUALTY
INSURANCE COMPANY,
INDEMNITY INSURANCE
COMPANY OF NORTH AMERICA,
and WESTCHESTER FIRE
INSURANCE COMPANY,**

Plaintiffs,

v.

SHAW INDUSTRIES, INC.,

Defendant / Counterclaim Plaintiff,

and

**COMMERCE & INDUSTRY
INSURANCE COMPANY,
FIREMAN'S FUND INSURANCE
COMPANY, FIRST STATE
INSURANCE COMPANY,
EMPLOYERS MUTUAL LIABILITY
INSURANCE COMPANY, GREAT
AMERICAN INSURANCE
COMPANY, U.S. FIRE INSURANCE
COMPANY, TRAVELERS
CASUALTY AND SURETY**

CIVIL ACTION NO.

1:23-cv-01367-RDP

**COMPANY, WESTPORT
INSURANCE CORPORATION f/k/a
PURITAN INSURANCE COMPANY,
JOHN DOE INSURERS 1-100,**

Nominal Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO
CONDUCT PARTIES' PLANNING MEETING AND MOTION FOR
LEAVE TO CONDUCT MEETING BY VIDEO CONFERENCE**

COME NOW the Parties, by and through their respective counsel, and hereby move this Honorable Court to enter an Order extending the deadline within which the Parties are to comply with the Rule 26(f) requirements set forth in the Court's Initial Order (Doc. 29). In support of this Motion, the Parties submit the following:

1. Pursuant to the Court's Initial Order, the Rule 26(f) conference is to be conducted on or before December 16, 2023. The Parties' Planning Meeting report is due 14 days thereafter.

2. All parties who have been served and/or appeared have conferred and, due to the number of parties and counsel, are unable to conduct the conference prior to January 2, 2024. All parties have agreed that counsel will be available and the date will be held pending the Court's decision on this Motion.

3. In order to facilitate timely completion of their Rule 26 obligations, the Parties likewise respectfully request the Court permit the conference to be conducted by video conference. Because of the complex nature of the action, the claims,

defenses and posture of the parties, the Parties likewise request additional time in which to submit the Parties' Planning Meeting Report.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully move this Honorable Court to enter an Order continuing the Rule 26(f) conference deadline for 30 days, from December 16, 2023, until January 16, 2024, and to permit the Parties to submit the Parties' Planning Meeting Report on or before January 30, 2024.

Respectfully submitted this the 14th day of December, 2023.

/s/ John W Johnson, II

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CERTIFICATE OF SERVICE

I do hereby certify that on December 14, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to the following counsel of record:

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